

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SARA TAYLOR, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

KIN INSURANCE, INC.,

Defendant.

Case No. 1:25-cv-00213

Judge: Hon. April M. Perry

Hon. M. David Weisman

**DEFENDANT'S RESPONSE TO COURT ORDER REGARDING
MOTION TO AMEND SCHEDULING ORDER TO BIFURCATE DISCOVERY**

Pursuant to this Court's Order dated July 31, 2025 (Dkt. 33) Defendant Kin Insurance, Inc. ("Kin") hereby respectfully submits this statement summarizing the targeted discovery requests it would ostensibly issue (and, to an extent, has already issued) should the Court grant its Motion to Bifurcate (Dkt. 28), from whom the discovery would be sought, and by what method.

As discussed in the Motion, Kin has obtained information showing an individual providing the name "Missie Gossett" (who appears to have been or is the owner of the subject phone number that Plaintiff alleges was called in this case) and may have provided Plaintiff's consent to be called or provided Plaintiff's cell phone number (via an internet opt-in) for the ostensible purpose of obtaining an insurance quote from Kin and/to fabricate a TCPA claim, possibly with Plaintiff's knowledge and participation. Such facts, if proven true, could be dispositive of Plaintiff's individual claim and end the case. Thus, Kin seeks narrow targeted discovery limited to issues relevant to determining the merits of Plaintiff's individual TCPA claim as alleged against Kin specifically: (i) whether Plaintiff received a "prerecorded" voicemail message on her cell phone; (ii) provided her "prior express consent" to receive such calls; and (iii) whether Plaintiff has standing to bring her

claim or would be an appropriate class representative.

In general, Kin primarily seeks discovery on (but not limited to) the following topics:

- All websites or URLs visited by Plaintiff, her spouse, or anyone living in her household on any internet-accessible computing device (e.g., smartphone, tablet, laptop, or PC), regardless of the subject matter, on or between August 1, 2024 to December 31, 2024.
- All internet providers and IP addresses for any internet-accessible devices in Plaintiff's household on or between August 1, 2024 to December 31, 2024.
- Information and documents reflecting any online or telephone inquiry made by Plaintiff or on Plaintiff's behalf or by someone in Plaintiff's household regarding insurance policies, goods, products or services or to any insurance company or provider on or between August 1, 2024 to December 31, 2024.
- Audio recordings or other electronic recordings for any phone calls received on the subject phone number that Plaintiff contends were made by or on behalf of Kin.
- Documents reflecting the subscriber and any other users of the subject phone number and the date the number was obtained.
- Billing and call records relating to the subject phone number from August 1, 2024 to present.
- Documents relating to consent, including documents evidencing communications with or connections between Plaintiff and "Missie Gossett," the IP address [REDACTED], or email addresses [REDACTED]@gmail.com or [REDACTED]@gmail.com.
- Information and documents reflecting Plaintiff's (or her family member's) communications with or prior purchases from Kin.
- Requests for admission relating to the foregoing topics.

A complete set of the discovery requests served upon Plaintiff are attached hereto as Exhibit

A. Defendant previously served Plaintiff with discovery relating to the above topics on June 27, 2025. *See Ex. A.* Defendant has also issued subpoenas to Verizon Wireless, T-Mobile, Charter Communications, Google, and Missie Gossett relating to the above topics. Defendant also intends to issue a subpoena to James Taylor (Plaintiff's spouse) regarding these topics.

Defendant primarily seeks written discovery from Plaintiff and subpoenas to produce documents from third parties. However, Defendant also intends to depose at least Missie Gossett and James Taylor, whom Kin believes may have information relevant to this case.

Dated: August 1, 2025

Respectfully submitted,

By: /s/ A. Paul Heeringa

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on August 1, 2025, the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic docket.

/s/ A. Paul Heeringa
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